

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 20 Civ. 4765 (JMP)

MOHAMMED THANI A. T. AL THANI ,

Plaintiff,

- against -

ALAN J. HANKE, et al.

Defendants.

December 3, 2021

10:00 a.m.

DEPOSITION of AMY ROY-HAEGER,
taken by the Plaintiff, pursuant to
Notice, held remotely via Zoom
videoconference, before Debbie
Zaromatidis, a Shorthand Reporter and
Notary Public of the State of New York.

1
2 **A P P E A R A N C E S :**
3

4 **HOGAN LOVELLS US LLP**
5 **Attorneys for Plaintiff**
6 **390 Madison Avenue**
7 **New York, New York**
8 **BY: MATTHEW DUCHARME, ESQ.**
9

10
11 **AMY ROY-HAEGER**
12 **Pro se**
13 **928 Melbourne Avenue**
14 **Melbourne, Florida 32940**
15
16
17
18
19
20
21
22
23
24
25

1

2 A M Y R O Y - H A E G E R,
3 having first been duly sworn by a Notary
4 Public of the State of New York, was
5 examined and testified as follows:

6 EXAMINATION BY MR. DUCHARME:

7 Q. Good morning, Ms. Roy-Haeger. I
8 am Matt Ducharme with the law firm of
9 Hogan Lovells. I represent the plaintiff
10 in this matter Mohammed Thani A.T. Al
11 Thani. I am going to ask you some
12 questions today.

13 First can you say your full name
14 for the record??

15 A. Yes, Amy Mary Roy-Haeger.

16 Q. And, Ms. Roy-Haeger, you and I
17 just had a brief conversation off the
18 record prior to starting today, and you
19 had agreed or consented that we could
20 exceed the two and a half hours for the
21 length of the deposition that we had
22 originally discussed a few months ago.

23 A. Yes.

24 Q. Thank you.

25 Ms. Roy-Haeger, have you ever

1 ROY-HAEGER

2 funded that they would be able to pay him
3 back because it was treated as a loan, and
4 I tracked everything.

5 Q. So you said that they were
6 associates of you and Mr. Hanke. So is
7 it correct to say that you and Mr. Hanke
8 were business partners?

9 A. No. Not business partners but
10 we worked on certain transactions together
11 as brokers, fellow brokers.

12 Q. And you participated in those
13 transactions with Mr. Hanke for your
14 mutual benefit; is that right?

15 A. Correct.

16 Q. Can you describe what those
17 projects were?

18 A. Sure. You have many of the
19 e-mails. There were different
20 commodities. He had some CBD
21 connections, and we had worked on a couple
22 of potential just contracts for providing
23 CBD oil. That was one of them, but
24 nothing ever came of that. There had
25 been several financial transactions. He

1 ROY-HAEGER

2 had had a receiver and -- at the time
3 Craig had had somebody who was trying to
4 send money from one jurisdiction to
5 another, and Alan had had a potential
6 receiver. We had also worked on a
7 project with LTNs from the Central Bank of
8 Brazil. He had had several clients and
9 Craig at -- and China Development Fund at
10 the time proposed that they would be able
11 to monetize the LTN and put it into an
12 investment program, so that was the
13 biggest project we had worked on heavily
14 until the central Bank of Brazil was not
15 cooperating.

16 Q. Did you and Mr. Hanke secure
17 investors for the LTNs?

18 A. He was working -- he was working
19 with several of his associates on that,
20 and he had received some investment funds
21 in order to work the fees that the seller
22 had. The holder of the LTN needed to pay
23 fees to the Central Bank of Brazil, and I
24 believe he helped secure some of those
25 fees.

1 ROY-HAEGER

2 Q. Do you know how much those fees
3 were?

4 A. I do not. He did that with his
5 associates, and that was -- that was prior
6 to him becoming involved with Craig on the
7 monetizing side, and then I do believe
8 that -- once Craig took over that and
9 started working between China Development
10 Fund and the Central Bank there may have
11 been fees. I do not know, but I was not
12 involved. That was a long time ago. I
13 do not remember. I have notes on that I
14 could go look at.

15 Q. Do you know approximately when
16 this occurred date-wise?

17 A. Probably 2016 to 2017.

18 Q. That reminds me going back for a
19 second, Ms. Roy-Haeger. You still use the
20 e-mail address I think it is LR Funding
21 2016@gmail. Is that La Renaissance's
22 e-mail address?

23 A. I mean it was just my personal
24 e-mail address. The LR did stand for La
25 Renaissance, but I have -- that was just a

1 ROY-HAEGER

2 personal e-mail address I have used for a
3 long time. But, yes, I use that as my
4 main e-mail address.

5 Q. So what was -- you described the
6 CBD project and the LTNs. What was your
7 role in both of these projects.

8 A. Just acting as a broker.

9 Q. So what exactly --

10 A. Putting a buyer and seller
11 together. Putting a buyer and a seller
12 together, so we -- as a broker we have one
13 end of the deal. We have somebody that is
14 holding an asset and needs to sell it or
15 we have somebody that would like to buy an
16 asset or a commodity, and we find the
17 seller.

18 Q. And you would get commissions
19 for doing that?

20 A. Correct. Upon a successful
21 transaction.

22 Q. Okay. And were any of these
23 successful?

24 A. On the commodities side, no. On
25 the LTN, no. The Central Bank -- at the

1 ROY-HAEGER

2 time the Central Bank did not follow
3 through with the commitment that they had
4 made to the holder of the LTN.

5 Q. Okay. And this is the same
6 Central Bank -- I am sorry. You said
7 this is Central Bank of Brazil.

8 Are there any other projects
9 besides the two we just talked about that
10 you worked on with Mr. Hanke?

11 A. Yes. There was in continuing
12 -- once Vast dissipated, there was another
13 company that had been put together.
14 Several partners in the waste energy or
15 several associates had continued on
16 keeping alive the IP that they had held
17 from when the CEO died of Startech, and so
18 there has been since 2008 when the
19 financial markets fell apart and they had
20 funding they then continued on, the
21 partners, and those guys had set
22 up -- continued on and set up various
23 companies depending on certain
24 jurisdictions and where they were with
25 trying to launch the waste energy company,

1 ROY-HAEGER

2 and so, therefore, when he -- when one of
3 the principals had decided that they had
4 some sites that had been interested in the
5 technology he started another company, and
6 that was the Vortext Company, and so he
7 was looking for investors, and that is
8 when Alan did put some money into that
9 company for a minority share.

10 Q. Okay. Do you know
11 approximately how much money Mr. Hanke put
12 into Vortext?

13 A. Yes, it was between 25 that to
14 30,000.

15 Q. Do you know approximately the
16 time period in which he put that money
17 into Vortext?

18 A. That would have been 2019 to
19 2020.

20 Q. And Mr. Hanke received equity in
21 Vortext as a result of contributing 25 to
22 30,000?

23 A. Yes.

24 Q. I am sorry. Ms. Roy-Haeger did
25 someone enter the room. Yes, my husband

1 ROY-HAEGER

2 walked in here. Our office room goes from
3 the main house to this room and to the
4 garage, and I asked him not to use it, and
5 he forgot.

6 Q. No problem. I have a similar
7 situation. Has he left the room?

8 A. He has. In fact let me shut
9 the door because he always leaves the door
10 open as well.

11 Q. Ms. Roy-Haeger, if you want to
12 go off the record for a couple of minutes
13 that is fine?

14 A. No, that is okay.

15 Q. Okay. Do you know what
16 percentage of Vortext Mr. Hanke owns?

17 A. It was 5 percent at the time and
18 Vortext has also been shut down.

19 Q. Okay. Did you have any equity
20 in Vortext?

21 A. I did. Mean was somewhere
22 around I think 25 to 30 percent.

23 Q. Did you contribute funds to
24 Vortext?

25 A. I have and over time with the

1 ROY-HAEGER

2 same principals of it I have probably
3 \$400,000 invested, but within Vortext I
4 was not the main investor in Vortext. It
5 was more for the past ten years of the
6 work we had done setting up potential
7 locations, potential sites.

8 Q. Just so I am clear overtime
9 either contributing it to Vortext or the
10 predecessors you have contributed roughly
11 \$400,000 of your own funds to these
12 companies?

13 A. Yes. Correct.

14 Q. And where did you get that
15 money?

16 A. From -- just over time
17 different -- various investments I had,
18 various -- in exchange for compensation or
19 the business we were doing on the paying
20 stream, so this money I made over ten
21 years.

22 Q. So for --

23 A. Some of it. Some was my
24 husband's money. Yes.

25 Q. So personal savings?

1 ROY-HAEGER

2 A. Yes, or exchange for services.

3 But yes.

4 Q. Was all of that money lost when
5 you closed down Vortext or --

6 A. Yes.

7 Q. Okay. Did you ask Mr. Hanke to
8 contribute the 25 to \$30,000?

9 A. I did.

10 Q. Okay. And why did you ask him
11 to do that?

12 A. Because he said he had some
13 experience in waste energy. He said that
14 he had some potential sites available, and
15 he had had an interest in it. We were
16 looking for good people to reestablish a
17 company, and I -- he had shown some
18 interest in it.

19 Q. Okay. So essentially you had a
20 bunch of money tied up or that you
21 contributed to this company, and you
22 thought Hanke could contribute his
23 experience and also some finances to
24 hopefully make the company profitable.

25 Is that --

1 ROY-HAEGER

2 A. Basically to launch a new
3 company and he -- yes, I mean basically he
4 showed an interest. He showed experience
5 in waste energy, and he had been
6 interested in helping to contribute to
7 launch a waste energy company.

8 Q. And you welcomed that because
9 you could financially benefit from it if
10 the company was successful because you had
11 an equity share of it, correct?

12 A. Correct. And there was a
13 gentleman by the name of Victor -- I
14 forget his last name. One moment. It
15 was Victor Sziky. I will spell his last
16 name. Sziky, S-Z-I-K-Y for the court
17 reporter.

18 Q. What was his role with Vortext?

19 A. His involvement had been as one
20 of the lead principals. He had been the
21 head distributor that had contacts with
22 South and Latin America at the time when
23 Startech had been active as a
24 manufacturer, and he had been able to
25 secure multiple municipalities in Panama.

1 ROY-HAEGER

2 So he had vast experience in waste energy
3 especially the plasma system that had been
4 the technology of Startech. He has been
5 continuing to attempt to bring a company
6 to light that would be able to continue
7 the technology that Startech had between
8 himself and another party that had been
9 one of the executives at Startech.

10 And so at the time in 2008 he
11 had secured a large amount of financing
12 until the financial crash, and so he was
13 waiting for the right time, and he has
14 been working for the last ten years to
15 relaunch the technology, and that is when
16 he had approached Alan to relaunch the
17 company.

18 Q. Now, was the Alan CEO of
19 Vortex?

20 A. Yes.

21 Q. Was he compensated for that
22 position?

23 A. No, he was not.

24 Q. And you at one point had
25 potential I guess leads I will say in New

1 ROY-HAEGER

2 A. I truly do not.

3 Q. Then that's fine. Just let me
4 know that.

5 A. I would be happy to get you the
6 information. I do not recall.

7 Q. Okay. I am going to go to page
8 11 of Exhibit 1. This is an e-mail from
9 Victor to you, Ms. Roy-Haeger, and Victor
10 states that Alan then in April sent
11 \$25,000 to our Wells Fargo -- to our Wells
12 account with Alan stating if we need more
13 please advise in advance.

14 This e-mail is dated November
15 22, 2019. The reference there to Mr.
16 Hanke sending money in April, would that
17 be April 2019?

18 A. Yes.

19 Q. So in April 2019 Mr. Hanke sent
20 \$25,000 to the Wells account of Vortex,
21 correct?

22 A. Correct.

23 MR. DUCHARME: Okay. I am going
24 to take down this document, and I am going
25 to bring up a new one. This is going to

1 ROY-HAEGER

2 the sites. If I run into somebody that is
3 looking for waste energy, then I refer
4 them to Victor, which is what I did on
5 anything that came in.

6 Q. I am going to take that exhibit
7 down for now.

8 Let me go back, Ms. Roy-Haeger.
9 We talked about the CBD company, LTNs,
10 Vortext. Are there other projects or
11 companies in which you and Mr. Hanke were
12 both involved in?

13 A. No. It had mostly been about a
14 period of time of about a year where we
15 worked on some of the instruments that had
16 been available. There were the reefers
17 when he had a reefer out of Thailand that
18 Craig had tried to do a file with but
19 could not get updated screens. So for
20 whatever reason there was none. We did
21 try to do the thing with CBD. I am trying
22 to think. Then also we had considered a
23 potential fuel transaction when both of us
24 had a connection out of Nigeria for
25 Bonilite, but I did not pursue it. He

1 ROY-HAEGER

2 had initially looked to do it. We were
3 looking into it, and that was as far as it
4 had gotten on my side.

5 So we had a lot of potential
6 connections that were the same parties.
7 We knew a lot of the same people, and when
8 a transaction mostly on the commodity side
9 we would present itself we would look at
10 it, analyze it, see if it made sense. A
11 lot of times in these transactions the
12 files have either been shopped around or
13 they have -- somebody has gotten a hold of
14 it that doesn't actually own it. So we
15 have to go through and find out if they
16 are really the owner of the fund, and like
17 80 percent of the time they are not, but
18 we have analyzed a lot of transactions but
19 have not gone forward with very many of
20 them.

21 Q. How is that you and Mr. Hanke
22 had a lot of the same connections?

23 A. In the broker world of
24 commodities, whether it be financial
25 instruments, whether it be fuel, whether

1 ROY-HAEGER

2 it be sugar, even CBD, any of those types
3 of transactions require money movement.
4 They require letters of credit for
5 shipping. A lot of the same tools that
6 would be used in various different types
7 of commodities all use a lot of the same
8 backing and the same instruments, and so,
9 therefore, you run into a lot of the same
10 people. For instance, people that are
11 financing fuel transactions, people that
12 are trying to move sugar, people that are
13 even working on historical assets on these
14 gold-backed instruments, people even
15 trying to finance PPE in the time of
16 Covid. They are all very similar people.
17 I mean I'VE run into a lot of the same
18 people for the last 20 years.

19 Q. Did you also try to purchase PPE
20 in the wake of the Covid 19 pandemic with
21 Mr. Hanke involved?

22 A. Very little. Mr. Hanke early
23 on decided that he did not want to have
24 anything to do with 3M or any of the big
25 players. So he had looked at it

1 ROY-HAEGER

2 temporarily on a smaller scale, but from
3 what I know he really didn't do much with
4 it. I did work on two very large clients
5 with some attorneys that I knew, and it
6 was a very frustrating process, and they
7 had funds tied up in Europe, and the
8 manufacturers want people to have funds in
9 the states, and the procedures were very,
10 very difficult.

11 Q. Putting aside the money that was
12 invested in Vortex and putting aside the
13 money that Mr. Hanke deposited in either
14 the La Renaissance or Shield Your
15 Lifestyle bank accounts, did Mr. Hanke
16 send any other funds to any company or
17 project you were involved in?

18 A. That I was involved in. The one
19 loan agreement that he had done for a
20 company that was in the gold business
21 with -- what was the name of the
22 company -- Gray Eagle and the AU. He had
23 multiple companies. The names I forgot
24 which one he did it under, but I did
25 introduce Alan to the principal there, and

1 ROY-HAEGER

2 I believe he did end up doing a loan, and
3 he has not yet been paid back for that
4 loan from my understanding, but I have not
5 followed up on that in probably a year and
6 a half because the principal of Gray Eagle
7 stopped talking to me the minute he got
8 the loan.

9 Q. And is it possible you are
10 mistaken, that the AUTP is the --

11 A. Yes. Correct. He had
12 multiple names. I think he did it under
13 AUPT.

14 Q. And the principal you were
15 referring to is a gentleman by the last
16 name of Porter?

17 A. John Porter, yes. Correct.

18 Q. John Porter. Okay. How do
19 you know, Mr. Porter?

20 A. He was a referral from a friend
21 of mine actually from several parties, but
22 I think I initially met him through Dr.
23 Mark Switzer.

24 Q. And you connected him to Mr.
25 Hanke?

1 ROY-HAEGER

2 A. I did.

3 Q. Because Mr. Porter was looking
4 for a loan?

5 A. Multiple things. Mr. Porter
6 was looking to acquire quite a few gold
7 mines and set up a gold investment fund,
8 which would have assets behind the
9 investment fund, which is in all of the
10 projections and any of the people that had
11 take a look at his business plan and the
12 parties that were the other investors for
13 John that I had talked to it was a very
14 solid business plan. So no, it was
15 not -- at the time it was not for the
16 loan. It was for looking at what he was
17 putting together for the next five years
18 as far as an investment in a gold fund.

19 Q. And the purpose of connecting
20 Mr. Hanke is that Mr. Hanke potentially
21 had clients that would be willing to
22 invest in the gold fund?

23 A. That was it or wanted to --
24 maybe he had clients that would want to be
25 principals in some of the mining

1 ROY-HAEGER
2 operations. We also had some friends in
3 Brazil that had options on 12 sugar mills
4 that were in process, and John Porter has
5 a very large connection down in Brazil, so
6 we put those two together. There is a
7 lot of different crossovers.

8 Q. Okay. And you understand if
9 Mr. Hanke was going to be providing money
10 to Mr. Porter it wasn't going to be his
11 personal fund. It was funds from a
12 client, correct?

13 A. I did not -- I believe so.
14 Yes.

15 Q. Okay. And you understand that
16 Mr. Hanke perhaps among other things but
17 at the very least provided Mr. Porter with
18 \$600,000?

19 A. Yes.

20 Q. And do you have an understanding
21 of where those funds came from?

22 A. I do now. Yes.

23 Q. What is your understanding now?

24 A. That they came from the same
25 investment from Mr. Al Thani.

1 ROY-HAEGER

2 Q. When Mr. Porter received that
3 600,000, did you get any form of
4 commission for putting the parties
5 together?

6 A. There was a fee that was paid.
7 I believe it was \$15,000, and it was paid
8 out to the various parties that had been
9 involved, and then in the end I did not
10 keep any of the money. The money went
11 out to two referring parties. One was
12 Paul Ramirez, who also claims he is the
13 one who introduced me to Mr. Porter. The
14 other one was Dr. Mark Switzer. So the
15 funds were paid as a referral fee for the
16 transaction, and they were all paid out,
17 and you can see through my accounting at
18 Lifestyle that all of that went out.

19 Q. So the Shield Your Lifestyle
20 account received the \$15,000 you were just
21 referring to?

22 A. Yes, it did.

23 Q. That was sent to you by Mr.
24 Porter?

25 A. Correct.

1 ROY-HAEGER

2 Q. And then you sent all of that
3 out to two other individuals, Paul Ramirez
4 and Dr. Switzer, Mark Switzer, and some of
5 it went to Craig?

6 A. For keeping -- for whatever
7 expenses he needed for the SBLCs to stay
8 active. So it was all paid out. So
9 most of it was paid. Some as referral
10 fees to Mark and Paul, others to a fee
11 that Craig had needed for expense money.

12 Q. What do the SBLCs have to do
13 with the \$600,000 that went to Mr. Porter?

14 A. The returns for -- in regards to
15 the transaction with Mr. Porter, it does
16 not have anything to do with it. In
17 regards to keeping the expenses and the
18 SBLCs intact for the trade agreement that
19 had been signed between Craig and Alan,
20 that is where Alan's profits were to come
21 from. So Craig said he needed certain
22 expense money, and so it was sent.

23 Q. And so just so I understand part
24 of the \$15,000 you received as a
25 commission for putting together the

1 ROY-HAEGER

2 \$600,000 that went from Hanke to Porter
3 and to Craig to pay for expenses he was
4 incurring in connection with a separate
5 transaction that was backed by the SBLC;
6 is that right?

7 A. That is what I believe. Yes.
8 Again, I would like to check my records.

9 Q. Okay. I will request here on
10 the record that you produce those
11 documents, and by those documents I would
12 like the bank account information showing
13 the flow of the funds we have been
14 discussing in Shield Your Lifestyle and La
15 Renaissance?

16 A. Okay.

17 Q. Just give me a second.

18 (Pause.)

19 Q. Mr. Hanke was expecting
20 obviously to be repaid the \$600,000 he
21 sent to Mr. Porter but also was expecting
22 additional payments; is that right?

23 A. From -- from the loan with John
24 Porter?

25 Q. Yes.

1 ROY-HAEGER

2 A. And he has never returned
3 another phone call or e-mail of mine.

4 Q. Have you received any other sort
5 of commissions either you or your company
6 Shield your lifestyle or your prior
7 company La Renaissance for work you have
8 done for Mr. Hanke or projects you have
9 worked on with Mr. Hanke?

10 A. I do not believe so. No.

11 Q. Are you currently employed?

12 A. I have a contractor position as
13 executive director of RCA, and then I am
14 self-employed. So all of them are
15 contractor positions. I do not have any
16 W-2 from any company or employer.

17 Q. And RCA is is an acronym for
18 Regulatory Compliance Association?

19 A. Correct.

20 Q. How much are you compensated at
21 RCA?

22 A. I am compensated for hourly work
23 at \$21 an hour, and previous to Covid when
24 we did our conferences I was paid about
25 50,000 a year. I worked 50 hours a week.

1 ROY-HAEGER

2 Now, in 2020 we basically had no ability
3 to do conferences. So I made about 15 to
4 20,000, and currently I am the only person
5 left, and we are billing at maybe 10 to 20
6 hours a week. I am just keeping
7 everything going, answering e-mails, and
8 making sure that people who had paid for
9 their certificates are getting their
10 courses, and that is about it because we
11 cannot do any live conferences, which was
12 the gist of our business.

13 Q. So prior to 2020 prior to the
14 pandemic when you were still doing
15 conferences, was the compensation you were
16 receiving from RCA your primary source of
17 income?

18 A. Yes, it was.

19 Q. How long have you been with RCA?

20 A. Since the end of -- since 2018.

21 Q. RCA has offices in New York,
22 correct?

23 A. They have a virtual office in
24 New York. There is really a conference
25 center. They put together conferences,

1 ROY-HAEGER

2 and they have a virtual learning
3 management system for courses, and twice a
4 year they would put together a conference
5 where they would bring regulators, asset
6 managers, and the providers which usually
7 are law firms and CPA firms. That was
8 what they did. So they put on
9 conferences, so they really only had a
10 virtual office in New York.

11 Q. What do you mean by a virtual
12 office in New York?

13 A. A mailing address and a place
14 where -- I mean it is mainly just a
15 mailing address. There is no full office
16 there. If we ever wanted to rent one of
17 the conference rooms, we could rent a
18 conference room there.

19 Q. Does RCA still maintain that
20 mailing address?

21 A. Yes, it does.

22 Q. Okay. What is that mailing
23 address.

24 Q. 733 Third Avenue, 16th Floor,
25 New York, New York, 10028.

1 ROY-HAEGER

2 Q. Did you ever work out of that
3 office?

4 A. No, I did not. Again, there is
5 no office there. It was just a mailing
6 address.

7 Q. Did you ever rent a conference
8 room?

9 A. I did not.

10 Q. You went to New York each time
11 time there was a seminar being hosted by
12 RCA; is that correct?

13 A. That's correct.

14 Q. And how often would that occur,
15 and let's focus I guess prior to the
16 pandemic?

17 A. Spring and fall. So beginning
18 of May and the beginning of October.

19 Q. So you would go to New York
20 twice a year?

21 A. Correct.

22 Q. Would you go to New York for
23 anything else, any employment?

24 A. No.

25 Q. And when you were in New York

1 ROY-HAEGER

2 for the seminars, how long would you stay?

3 A. We would get there the night
4 before, and then we would do a women's
5 conference the first night. So I would
6 get there say on a Monday. We would do
7 the women's conferences Tuesday night and
8 then the big symposium Wednesday and leave
9 Thursday morning. So three days.

10 Q. Okay. And you would recruit
11 people to attend these symposia and
12 seminars?

13 A. We -- we did. We had somebody
14 the head of marketing that did that. I
15 did not. The head of marketing did it.

16 Q. Did you ever invite people to
17 attend seminars?

18 A. I did. Yes.

19 Q. People in New York?

20 A. Yes.

21 Q. Do you recall who?

22 A. One of them was Mike Martino. I
23 invited him there, since he was in the
24 industry, and we actually had members that
25 were asset management companies. So yes,

1 ROY-HAEGER

2 I did invite Mike.

3 Q. Okay.

4 A. And then any other participants
5 I called in to the company or that we
6 might have had as referrals.

7 Q. So would you consider that RCA
8 is headquartered in New York?

9 A. I would say it is a Delaware
10 company whose main clientele are in New
11 York.

12 Q. And their only mailing address
13 is in New York?

14 A. No. They have a mailing
15 address in New York as well as Delaware.

16 Q. Understood. The one for
17 Delaware, is that just a legal formality
18 since they are registered in Delaware?

19 A. It is a registered agent.
20 Correct.

21 Q. Okay. I am going to pull up
22 another document, tab 3, which I will mark
23 as Exhibit 3.

24 (Exhibit 3 marked for
25 identification.)

1 ROY-HAEGER

2 Q. Do you see that, Ms. Roy-Haeger?

3 A. I do.

4 Q. This is an e-mail. I guess I am
5 looking at the e-mail on the first page
6 the bottom half. It is from you to Mr.
7 Martino, and Mr. Hanke is on this e-mail
8 as well.

9 I think this was in reference
10 what we were just talking about?

11 A. That is correct. Yes.

12 Q. You have a signature block here,
13 and it lists you as the schedule director
14 at RCA, and it has the office address 733
15 Third Avenue, 15th floor, New York, New
16 York that we were just discussing,
17 correct?

18 A. Correct. And can you correct
19 my address? I had the zip code wrong when
20 I gave you the address.

21 Q. I think the floor -- it says
22 15th floor.

23 A. It changed right around 2020.
24 It changed from the 15th to the 16th.

25 Q. Okay. Now, if it is just a

1 ROY-HAEGER

2 mailing address, I guess I am confused as
3 to why the floors changed. I mean were
4 there any physical offices that RCA had
5 access to?

6 A. No. The 15th floor is where
7 their check in is, where the administrator
8 who takes in everybody's mail is, and they
9 switched it from the 15th to the 16th
10 floor. So if you don't put the floor,
11 then it gets lost because there is no
12 office there. So you have to put the
13 floor, so that it knows to go to the
14 administrator team.

15 Q. Understood. And they moved from
16 the 15th to the 16th floor. It has a
17 direct line here. Was that your direct
18 RCA line?

19 A. That was my cell phone at the
20 time.

21 Q. That is a 646 area code. That
22 is a New York area code?

23 A. Correct. The company gave me
24 that. Yes.

25 Q. Did you participate in any way

1 ROY-HAEGER

2 in the compliance training programs that
3 RCA offers?

4 A. I took several of the courses
5 just to see more of the format, and I also
6 checked the courses once they were ready
7 to be placed on to the LMS for formatting.

8 Q. Do you consider yourself an
9 expert in regulatory compliance?

10 A. I do not. I consider myself
11 somebody that helps run a certification
12 course and a company that puts on
13 symposia.

14 Q. Ms. Roy-Haeger, we have been
15 going about an hour and twenty minutes.
16 We can go a little longer, but I am
17 thinking we could take a break shortly.
18 I am at a natural stopping place. We can
19 do it now or if you want to go a little
20 longer. It is up to you.

21 A. Let's go a few more minutes, a
22 little longer.

23 Q. Sure.

24 How did you first meet Alan
25 Hanke?

1 ROY-HAEGER

2 A. Wow. I don't even remember.
3 How did I meet Alan? I am pretty sure I
4 met Alan from mutual associates with Tracy
5 French.

6 Q. And who is Tracy French?

7 A. He is just another associate
8 that is in the same business.

9 Q. And would you describe that
10 business as commodities trading or --

11 A. Commodities and financial
12 structuring.

13 Q. And do you know about how long
14 ago you were introduced to Mr. Hanke?

15 A. I do not recall. It had to be
16 four years ago.

17 Q. Now, at some point in time you
18 connected Mr. Hanke to Craig Hubner,
19 correct?

20 A. Yes, I did.

21 Q. Do you know approximately when
22 that was?

23 A. It would have to be the
24 beginning of 2019.

25 Q. And what was the purpose?

1 ROY-HAEGER

2 A. At the time to work on the LTN
3 transaction from Brazil that he had the
4 client for.

5 Q. When you say he had the client,
6 who is the he in that sentence?

7 A. Alan. Alan had the client and,
8 and Craig through some of his connections
9 mainly Chinese Development -- China
10 Development Fund stated that he had the
11 ability to monetize and fund against
12 certain assets.

13 Q. When you said that Mr. Hanke had
14 a client, was that client Mr. Al Thani?

15 A. No. The client was the LTN
16 owner of the instrument in Brazil.

17 Q. And who was what?

18 A. I knew you were going to ask me
19 that. It was -- I don't know. Can I not
20 look some of these up? I swear I have a
21 bad short-term memory.

22 Q. What I could do is maybe
23 follow-up later, Ms. Roy-Haeger, and if
24 you want to voluntarily provide me the
25 information after looking it up, that

1 ROY-HAEGER

2 Q. How do you know Craig?

3 A. I met Craig when I was on a trip
4 to Hong Kong, and somebody referred me to
5 Craig as somebody that was very
6 knowledgeable working with financial
7 instruments. He also had a knowledge on
8 some of the historical assets.

9 Q. Have you and Craig been engaged
10 in any transactions or projects together?

11 A. There have been quite a few
12 transactions. I believe you have a lot
13 of Whatsapps and e-mails and things that
14 have been looked at. Most of them had not
15 been approved by both sides. You always
16 have to match up procedures on both ends.
17 So we have looked at quite a few
18 transactions and gone forward with very
19 few mainly because we could not get what
20 we needed or the verifications from the
21 project owner, from the asset owner.

22 Q. But to the extent that any of
23 these do successfully get put together,
24 you receive a commission for that?

25 A. What I do for Craig is basically

1 ROY-HAEGER

2 mostly administrative work, and I will do
3 the work there, and if anything is
4 successful then there would be a bonus
5 that would be discussed at the time, but I
6 do not have -- I have -- I do not believe
7 I have any formal compensation agreements
8 from him, but that is -- that is typically
9 how it would work.

10 Q. And when you say successful that
11 means just the investment is made,
12 correct?

13 A. Correct. It is not the
14 investment made. No. Most of these
15 transactions require somebody putting up
16 an asset, somebody from a financial
17 institution point of view putting money
18 against that asset, and the commodity
19 transaction is successfully executed;
20 therefore, either a commodity was bought
21 and sold and in turn there would be a
22 profit on it or there was an investment
23 made from the leveraging of the assets.

24 Q. And did that ever occur such
25 that you received a commission?

1 ROY-HAEGER

2 A. No.

3 Q. So of all the projects you have
4 worked on with Craig Hubner, none of them
5 ultimately were successful?

6 A. No, they were not. Hang on a
7 minute, please.

8 (Pause.)

9 A. Go ahead.

10 Q. Are you still working and
11 collaborating with Mr. Hubner on potential
12 investments?

13 A. No, I am not. I am simply
14 waiting for him to -- he is working on
15 multiple transactions on his own to make
16 good on the loan agreement that he has
17 with Mr. Al Thani, and now that he knows
18 what is behind it -- he was not aware of
19 it at the time, and he is -- so no, I am
20 waiting for him to make good on that. I
21 do not speak to him hardly at all other
22 than to ask where he is on his current
23 transactions that he is going to do to
24 make good on this transaction. That is
25 the extent of any conversations right now.

1 ROY-HAEGER

2 Q. So Craig and Alan entered into a
3 loan agreement, correct?

4 A. That's correct.

5 Q. And were you involved with the
6 negotiation or execution of that loan
7 agreement?

8 A. I was working as an admin role
9 and for whatever reason, and I don't know
10 what made me do this, but Craig said I
11 feel like they would want U.S.
12 jurisdiction. So will you sign this as a
13 power of attorney, attorney in fact, so
14 that we could get it over to Alan with
15 proper jurisdiction, and unfortunately
16 without thinking I accepted that role to
17 do it, and I executed the agreement
18 unfortunately. That is how my name got
19 on it. He had done the agreement. He
20 had negotiated the terms with Alan, but
21 for whatever reason he had me sign as
22 power of attorney.

23 Q. Why do you say that it was
24 unfortunate?

25 A. Because that brought me into the

1 ROY-HAEGER

2 Q. I want to try to better
3 understand I guess the flow of the money.

4 A. Okay.

5 Q. Right before I get there, you
6 mentioned a Pedro. Do you have a last
7 name?

8 A. Lobo, L-O-B-O.

9 Q. Okay. So the loan agreement
10 obviously is between Craig and Mr. Hanke.
11 So that million dollars that Hanke was
12 putting up, you understood that wasn't
13 Hanke's personal funds, correct?

14 A. Correct.

15 Q. You understood that that would
16 have come from an investor?

17 A. Yes, I did.

18 Q. And here that was Mr. Al Thani,
19 correct?

20 A. I am trying to remember at what
21 time I was informed of who the investor
22 was. I really don't know the timeframe
23 of when I was made aware of who the
24 investor was. I was not aware of any of
25 the contracts or the contents of contracts

1 ROY-HAEGER

2 that Alan had signed with him, but I don't
3 know the time frame of when I was informed
4 who the investor was. I could look it up
5 in my notes and get that to you.

6 Q. So after the loan agreement,
7 where did the money go?

8 A. So the money initially was to be
9 sent to the China Development Fund's
10 account. And I believe it was PNB Paribas
11 at the time, and that was to come from Mr.
12 Mills Rogers' escrow account to be sent to
13 the account of CDF.

14 For whatever reason, and I never
15 really could quite understand it, that
16 transaction was not received in good order
17 by PNB Paribas Bank. For whatever reason
18 they did not want to take a wire from a
19 U.S. bank. At the time it was from Bank
20 of America. Nobody could ever really
21 figure out why that transaction got held
22 up. So they sent the money back, and
23 then eventually Craig was able to give him
24 out of Macaw an account directly with the
25 chief investment officer for China

1 ROY-HAEGER

2 Development Bank, which is Y.T. Li. So
3 there were -- since he was the CIO it was
4 sent to his account at Macaw where it was
5 received properly and was able to be
6 brought in.

7 Q. So the money is then wired to
8 Y.T. Li, who you say is CIO of China
9 Development Fund?

10 A. Correct.

11 Q. Then where does it go?

12 A. That I have no idea. I didn't
13 have any access to this account. I could
14 not get any proof of where that money
15 went, and they simply said it was used to
16 custody assets, but I have not been able
17 to get proof of any of that.

18 Q. And so the Pedro Lobo you
19 mentioned, what was his role here?

20 A. His role was that he is the one
21 who had brought Hagoth Trade to the table.
22 He introduced Hagoth to Craig Hubner. He
23 works closely with China Petroleum Company
24 and had a very high lineage between U.K.
25 and Hong Kong as his father helped

1 ROY-HAEGER

2 go through multiple parties. I had no
3 idea why I was updating them or what their
4 role was or what contracts he had with
5 them, but when Alan asked me to update
6 them on behalf of the transaction Alan had
7 been involved in with Craig I went ahead
8 and did the updates.

9 Q. So if I understand correctly you
10 are saying you don't know necessarily if
11 Lance and Lombard had invested necessarily
12 in this transaction with Craig?

13 A. That is correct. The only
14 transaction I know is a million dollars
15 was sent on that loan agreement, and in
16 turn Alan received -- was to receive a
17 participations in the transaction of the
18 SBLCs from both -- that both Craig and
19 Pedro had put together with their
20 investors.

21 Q. Okay. But let me just finish
22 the question.

23 So it was your understanding
24 that Lance and Lombard were expecting to
25 be paid out of any profits generated from

1 ROY-HAEGER

2 their transaction with Craig, correct?

3 A. At a later date way after the
4 investment had occurred and later only
5 when I was introduced to them I was made
6 aware that that was the expectation.

7 Q. Okay. Why was that the
8 expectation if they did not put any money
9 into the transaction with Craig?

10 A. I have no idea. I can only
11 assume that it -- with the returns Alan
12 was to expect from this that that was
13 part of his analysis of his investments he
14 had made within his own firm based on
15 other contracts he might have had with
16 investors. That -- I have no idea. All
17 I know is Alan was expecting a certain
18 amount from a contract he had with Craig,
19 and what he did further from that with his
20 own investors I have no idea. I am not
21 privy to any of that.

22 Q. Just so I have this right, to
23 your understanding the only investment to
24 that transaction with Craig was the
25 million dollars that originated from Mr.

1 ROY-HAEGER

2 Al Thani notwithstanding that fact Mr.
3 Hanke's intent was to use any profits from
4 that transaction to pay individuals beyond
5 just Mr. Al Thani including Lance Barker
6 and Lombard; is that correct?

7 A. That's correct.

8 Q. Okay. And who is Lance Barker?

9 A. My understanding is Lance is a
10 registered representative in the financial
11 markets, and he manages certain investor
12 assets. So he is a licensed
13 representative in the business.

14 Q. And in connection with the
15 updates you were providing Mr. Barker, he
16 was representing Lombard at that point in
17 time; is that correct?

18 A. He was requesting information as
19 having -- my understanding was they were
20 creating an annuity structure part of
21 which he had agreed to bring certain funds
22 to the table and he was working to
23 leverage the assets of Lombard in order to
24 set up this other financial structure in a
25 form of a private annuity. So what role

1 ROY-HAEGER

2 he played, what he was supposed to bring
3 to the table I do not know.

4 Q. All right.

5 A. Lombard was his client.

6 Q. Who is Lombard?

7 A. Lombard is an insurance company,
8 which is a subsidiary to my understanding
9 either of Black Rock or Blackstone, and
10 they are an insurance company that was
11 creating projects. They were doing an
12 offshore annuity structure, and they
13 needed either money to put the structure
14 together or investors, and so they were
15 Lance's client, and Lance was working to
16 help them put together the structure.

17 Q. And Lance then took some of
18 Lombard's money and gave it to Mr. Hanke
19 for investment purposes?

20 A. That is my understanding. I
21 have not seen any contracts, but that is
22 my understanding.

23 Q. And Lance Barker is based in New
24 York, correct?

25 A. Correct.

1 ROY-HAEGER

2 Q. Do you know if Lombard is based
3 in New York?

4 A. I do not.

5 Q. Now, there were other
6 individuals that were also seeking updates
7 from you related to the transaction with
8 Craig. That was Mike Martino, correct?

9 A. Correct.

10 Q. And he was working at a company
11 Four Point; is that right?

12 A. Yes. That is correct.

13 Q. Is it the same sort of situation
14 where Mr. Martino -- Mr. Martino on behalf
15 of Four Point did not invest in that
16 transaction with Craig but was still
17 expecting to receive payouts from any
18 profits from that transaction??

19 A. That is my understanding.

20 Q. And Mr. Martino is based in New
21 York?

22 A. Yes, he is.

23 Q. Are Four Point's offices also in
24 New York?

25 A. They are.

1 ROY-HAEGER

2 Q. Okay. Were there any other
3 individuals that you were updating about
4 this transaction with Craig besides --

5 A. I think mostly just the team of
6 Mr. Al Thani. Mr. Hanke had put me on a
7 call. I believe there was an attorney
8 involved. There were a couple other
9 parties. Then I started getting copies
10 of e-mails from several parties, and
11 then out of the blue this lawsuit with Mr.
12 Stevens comes into play, who I didn't even
13 know who he was until a year later when
14 apparently he was on a phone call that
15 Alan had asked me to do an update call,
16 and he was on that phone call. I have no
17 idea of anything having to do with him and
18 cannot believe I am in a lawsuit with him.

19 Q. Thank you.

20 A. I don't know how many more of
21 those China parties are out there.

22 Q. Do you recall how many update
23 phone calls you provided to Mr. Al Thani's
24 representatives?

25 A. No, there is two that I

1 ROY-HAEGER

2 remember. It could have been more.

3 Q. We will get to those in a bit,
4 but generally the purpose of the call was
5 for you to update Mr. Al Thani's
6 representatives as to the status of the
7 transaction, correct?

8 A. Correct.

9 Q. And at a point in time Mr. Al
10 Thani's representatives as well as Mr.
11 Barker, Mr. Martino started getting upset
12 that the transaction wasn't paying out,
13 correct?

14 A. Correct.

15 Q. And so you would provide these
16 updates as a way to alleviate their
17 concerns, correct?

18 A. I would provide whatever updates
19 I could based on the request for Alan to
20 have somebody other than himself giving
21 the updates, so that they could hear it
22 from a closer source to the person that
23 had executed that trade agreement.

24 Q. So Mr. Hanke represented you as
25 someone that was closer to the transaction

1 ROY-HAEGER

2 than he was?

3 A. He -- I am not sure how he
4 represented me because I have heard a
5 variety of issues, but I was -- I was
6 speaking to Craig more often, getting the
7 updates, and, yes, I would say I was
8 closer to the sources with Craig than he
9 was. Correct.

10 Q. And that is why Mr. Hanke wanted
11 you on those calls because you were closer
12 to the details of the transaction?

13 A. Yes.

14 Q. And that was aimed at providing
15 some assurances to these disgruntled
16 investors that their money would be
17 forthcoming, correct?

18 A. I am not sure about assurances,
19 but that at least somebody would give them
20 details of what the current update was
21 regarding the transaction that Hagoth was
22 supposed to be paying out on and stating
23 that they were being paid. So you can
24 imagine if somebody is stating that
25 payments are eminent, and that message is

1 ROY-HAEGER

2 start updating on any other transaction
3 that Craig was involved with. So he would
4 then update me on certain transactions he
5 was doing whether it be with China
6 Development Fund or any other broker he
7 worked with, and so I started getting
8 multiple updates on any other type of
9 transaction he had, and unfortunately
10 those transactions did not pay out either.

11 Q. But my question, Ms. Roy-Haeger,
12 was simply that on these phone calls and
13 e-mail updates putting aside the source of
14 your information, the update frequently
15 was that the money would be forthcoming,
16 correct?

17 A. That I would -- well, basically
18 if you want to interpret it that way, but
19 my update would be here is the status.
20 They state this. It does appear that it
21 is going to be forthcoming, and that we
22 will continue to update you and give you
23 status points, but part of the message
24 that was being communicated and passed
25 down was that there were transactions that

1 ROY-HAEGER

2 were scheduled for payouts. Hagoth
3 continued to state that the payout was
4 coming. And so was that information
5 passed along? Yes. How it is
6 interpreted, did I purposely state that I
7 wanted to tell him it was imminent? If I
8 was being told it was, then I would pass
9 that on. I would not state that if
10 I -- if it was not being told to me that
11 it was imminent. So I was not trying to
12 get them to hang on to avoid a lawsuit.

13 Q. You stated there was a point in
14 time where you switched to also updating
15 disgruntled investors as to the status of
16 other transactions, and that was because
17 the -- there were some doubts about the
18 likelihood of the main transaction paying
19 out; is that correct?

20 A. Yes, that is correct.

21 Q. And when did that occur?

22 A. That was probably the end of
23 2019. So about six months into it I would
24 say.

25 Q. Did you inform any of the

1 ROY-HAEGER

2 himself to get those cards downloaded, and
3 in the end there was something N.K. had
4 done that it was not a proper download.
5 I don't remember the specifics, but again
6 N.K. didn't do something he was supposed
7 to do, and that did not work.

8 Then N.K. ended up sending from
9 UBS a 103 wire, so he told them it was
10 going to be a 103 wire sent from UBS into
11 the account in Macaw that had come in, and
12 when they sent the copy of the Swift it
13 was for not funds -- not cash funds as
14 promised, but it was for a credit facility
15 that was only to be activated one year
16 from there. So there was nothing they
17 could do with that, and every time they
18 tried something and CDF would put their
19 resources toward it, N.K. would have some
20 glitch or some hiccup in it. It is like
21 the guy was grasping at straws, but he was
22 playing games and promising one thing and
23 delivering something else.

24 Q. Going back to the calls you had
25 with Mr. Al Thani's representatives, do

1 ROY-HAEGER

2 you remember an agent of Mr. Al Thani Sam
3 McGuinness on the line?

4 A. I do.

5 Q. On both of those calls?

6 A. Yes.

7 Q. Ms. Roy-Haeger, I think we are
8 at a good stopping place now.

9 A. Okay.

10 Q. If you want to take a ten-minute
11 break. Let's come back at 12:20 if that
12 is okay.

13 A. Okay. Sounds good.

14 (Recess taken.)

15 BY MR. DUCHARME:

16 Q. Ms. Roy-Haeger I am going to
17 mark my tab 18 as Exhibit 5. I will
18 share my screen with you.

19 (Exhibit 5 marked for
20 identification.)

21 Q. Do you see that document?

22 A. I do.

23 Q. And this is an e-mail from you
24 to Mr. Hanke on September 20, 2019, and
25 you are providing an update to Mr. Hanke

1 ROY-HAEGER

2 on the transaction, correct?

3 A. Yes.

4 Q. And when I say transaction, I
5 am -- you understand I am referring to the
6 transaction involving Craig in which Mr.
7 Al Thani's million dollars was invested.
8 You understand that?

9 A. I do.

10 Q. And so if you look at the e-mail
11 below, it is from Mr. Hanke at 9:01 a.m.
12 to you, and he says that "Steve Papi, Sam
13 McGuinness, and Mr. Abaz Sheikh head of
14 security have arrived in had Chicago.
15 They have demanded a meeting with me at 3
16 p.m. central. I need something written,
17 tangible, and verifiable to give them when
18 I arrive today."

19 Do you see this?

20 A. Yes, I do.

21 Q. And so the response that you
22 provided was for the purpose of Mr. Hanke
23 providing that update to Mr. Al Thani's
24 representatives at this meeting in
25 Chicago, correct?

1 ROY-HAEGER

2 A. Correct.

3 Q. And you did this on numerous
4 occasions, correct?

5 A. Correct.

6 Q. Providing updates --

7 A. Yes --

8 Q. Sorry. That is --

9 A. That is correct.

10 Q. Thank you.

11 And you essentially were
12 dictating what Mr. Hanke would say to Mr.
13 Al Thani's representatives by providing
14 this update because you were the source of
15 the information; is that correct?

16 A. Yes.

17 Q. Okay. I will take that
18 document down.

19 A. Okay.

20 Q. I am going to mark my tab 12 as
21 Exhibit 6, and I am going to share that
22 with you.

23 (Exhibit 6 marked for
24 identification.)

25 Q. Ms. Roy-Haeger, do you see that

1 ROY-HAEGER

2 A. So my understanding is that
3 letterhead was simply a company Craig was
4 involved with.

5 Q. Okay.

6 A. That update was coming from
7 Craig.

8 Q. If the update was coming from
9 Craig, why didn't Craig sign the letter?

10 A. I do not know. He just told me
11 Steven was an associate of his in that
12 company.

13 Q. So I am going to mark my tab 16,
14 and I will share my screen.

15 A. Okay. Let me see this.

16 (Exhibit 7 marked for
17 identification.)

18 Q. This is -- well I am going to go
19 down here. Let's see. So this here on
20 page 2 is an e-mail from Steve Papi, who
21 you understand is a representative of Mr.
22 Al Thani, correct?

23 A. Correct.

24 Q. And on January 3, 2020 he sends
25 an e-mail to Mr. Hanke saying that because

1 ROY-HAEGER

2 of the failures to comply with the
3 contractual agreements he essentially
4 wants to meet up with Mr. Hanke in the
5 United States to discuss; is that right?

6 A. Yes.

7 Q. Okay. And then going up the
8 page, Mr. Papi sends a follow-up e-mail on
9 January 4, 2020 to Mr. Hanke stating that
10 he awaits his response, and he says "PS
11 even New York can work. Just advise."
12 Do you see that?

13 A. I do.

14 Q. All right. And so that was Mr.
15 Papi suggesting that they could meet in
16 New York, correct?

17 A. Correct.

18 Q. Okay. And then going up the
19 page, the first page, Mr. Hanke then
20 forwards this e-mail to you and says "This
21 just in from Steve. I need some support
22 and answers." Correct?

23 A. Correct.

24 Q. And you say "Let's discuss in
25 detail tomorrow unless you want to now."

1 ROY-HAEGER

2 Do you see that?

3 A. I do.

4 Q. And so this essentially was Mr.
5 Hanke asking you for details again of the
6 transaction, so he could then provide
7 those details to Mr. Al Thani's
8 representatives at a meeting that they
9 were contemplating in New York, correct?

10 A. Correct.

11 Q. And did you then speak with Mr.
12 Hanke and provide him details on the
13 transaction?

14 A. I am assuming I did. I was
15 working to get him something in writing,
16 and the result of that was the letter.
17 Whenever Alan would ask for updates I
18 would give him whatever the current update
19 was.

20 Q. And so you would have
21 essentially told Mr. Hanke what he could
22 say to Mr. Papi at this meeting in terms
23 of the status of the transaction, correct?

24 A. I would have given him whatever
25 the most recent update was that I could

1 ROY-HAEGER

2 get. Yes.

3 Q. Okay. I am going to mark my tab
4 15 as Exhibit 8.

5 (Exhibit 8 marked for
6 identification.)

7 Q. I will share my screen. So you
8 see this is an e-mail from Mr. Papi again
9 to Mr. Hanke just a few days later on
10 January 6, 2020, and he is asking for an
11 update, and he says I will be heading to
12 New York and arrive Wednesday p.m. for a
13 meeting."

14 Do you see that?

15 A. I do.

16 Q. So at this point in time, Mr.
17 Hanke and Mr. Papi agreed to meet in New
18 York, correct?

19 A. Correct.

20 Q. All right. And you were
21 provided with this e-mail. Do you see
22 Mr. Hanke sent it to you later that day on
23 January 6? Correct?

24 A. Yes.

25 Q. Do you see it?

1 ROY-HAEGER

2 A. Yes.

3 Q. So you were aware that Mr. Hanke
4 was meeting with Mr. Papi in New York,
5 correct?

6 A. Correct.

7 Q. And the purpose of the meeting
8 was to provide Mr. Papi with an update
9 as to the transaction, correct?

10 A. Correct.

11 Q. And Mr. Hanke is turning to you
12 to seek an update that he can then give to
13 Mr. Papi, correct?

14 A. Correct.

15 Q. And you then provided that
16 update to Mr. Hanke to then relay to Mr.
17 Papi at the meeting in New York, correct?

18 A. Correct.

19 Q. Did you provide any documents to
20 Mr. Hanke that he could then share with
21 Mr. Papi at his meeting?

22 A. I don't remember. I think
23 there were two updates in writing. One
24 was the one you previously showed me, and
25 then there was another further one that

1 ROY-HAEGER

2 A. No, I don't, but I would have
3 given them any update I would have
4 received from both Pedro or Craig, and
5 Pedro usually you have updated Craig. So
6 this time he had it -- what Pedro had done
7 is copied a message on to my Whatsapp,
8 which is why when I sent it and forwarded
9 it to Alan it looks like it came from me.
10 So I had to state that that was a copied
11 message that Pedro had sent to me. Yes, I
12 would have gotten as many updates as I
13 could in order to go into stating whatever
14 factual information I had for that call.

15 Q. Understood.

16 How did you introduce yourself
17 during that call? Do you recall?

18 A. I do not think I introduced
19 myself. I just got on and answered
20 questions and gave an update, but I really
21 don't remember. It was put on very
22 quickly, and everybody had been on the
23 call. Alan joined me on the call and
24 asked me to start giving updates.

25 Q. Got you. Now, let's look at

1 ROY-HAEGER

2 page 13 at -- hold on one moment. At
3 7:52 a.m. on January 9, 2020, you state "I
4 am sending an e-mail with details on this
5 transfer, which is being completed in
6 eight hours, as they are moving it now."

7 Do you see that?

8 A. I do.

9 Q. And you recall previously we
10 were looking at e-mails during this very
11 time period in which Mr. Hanke was going
12 to be meeting with Mr. Papi and Mr.
13 McGuinness in New York, correct?

14 A. Correct.

15 Q. So is it your understanding that
16 you were sending those details on the
17 transfer to Mr. Hanke on the early morning
18 of January 9, 2020, so he could then share
19 this information with Mr. Papi and Mr.
20 McGuinness at the meeting in New York?

21 A. That makes sense. Yes. I am
22 trying to read these to refresh my memory
23 here.

24 Q. It looks like that is the only
25 message at all in January of 2020. So I

1 ROY-HAEGER

2 A. Yes, I am not sure that he ever
3 changed the letter. I don't think he
4 did. I would have to go look. I can go
5 look and see if there was ever a follow-up
6 letter done.

7 Q. Yes, I would like to make that
8 request on the record. Yes, please.

9 A. On that day it was
10 July -- somewhere in the end of June 26.
11 Okay.

12 Q. Correct. So we spoke earlier
13 about Mr. Mike Martino of Four Point. Do
14 you recall that?

15 A. Yes.

16 Q. Okay. And he was one of the
17 disgruntled investors in which you were
18 providing updates to in connection with
19 the Hagoth transaction among others,
20 correct?

21 A. Correct.

22 Q. And you met with Mr. Martino in
23 New York?

24 A. Yes, I went to his office
25 because I had asked Mr. Hanke if he knew

1 ROY-HAEGER

2 anybody that had an extra office that we
3 could use instead of just our virtual
4 office and that conference facility for
5 smaller meetings. So he suggested and
6 introduced me via e-mail or text to Mr.
7 Martino, and I took my head of marketing,
8 and we went there to specifically look at
9 his office to see if he would be
10 interested in renting us a space. At the
11 time we were thinking about actually
12 hiring one party that would be in New
13 York, since we were all out of Florida for
14 RCA.

15 Q. And when --

16 A. That never came to pass.

17 Q. And when was this meeting?

18 A. That was -- I don't remember.
19 You should have it in your notes. Let me
20 see. That was -- I was there for one of
21 my conferences. So it had to be November
22 because I was there for the conference.

23 Q. Let's look at some text messages
24 and maybe that will help.

25 A. Okay.

1 ROY-HAEGER

2 Q. I am going to mark tab 26 as
3 Exhibit 14.

4 (Exhibit 14 marked for
5 identification.)

6 Q. First of all, do you recognize
7 this document?

8 A. I didn't share it with you. I
9 apologize. Do you see it now,
10 Ms. Roy-Haeger?

11 A. Yes.

12 Q. And this is screen shots of text
13 messages that you had with Mr. Martino,
14 correct?

15 A. Correct.

16 Q. Wednesday, April 24, 2019 Mr.
17 Martino says "GM." I assume he means
18 good morning. "Hope mom is well.
19 Looking forward to your visit. Let me
20 know what works. TY."

21 Do you see that?

22 A. Yes.

23 Q. And then Mr. Martino asks "I
24 might come down with AH Wednesday."

25 Is AH Alan Hanke?

1 ROY-HAEGER

2 A. Yes, Alan apparently had a
3 meeting there with Mike and was in town
4 the day I was flying in for the
5 conference. So he thought about coming
6 down to our conference, but then Alan flew
7 out early that morning. Mike did stop by
8 at our conference for the reception
9 afterwards.

10 Q. Okay. So this refreshes your
11 recollection as to the date of your
12 meeting with Mr. Martino in New York? It
13 was in or around May 6, 2019.

14 A. I am trying to think because
15 there was one time I met with him, and
16 then one other time when he came over. I
17 think it was around the same time. What
18 day did I meet with him? I am trying
19 think. Is there another screen on that?
20 What is after that?

21 Q. If we go to this page just say
22 "I am here with K Wok," and you say "Great
23 seeing you," and this looks like it
24 is -- it is hard to tell because these are
25 sort of -- I don't know which way to go.

1 ROY-HAEGER

2 I guess this would be from --

3 A. So he was saying he may come
4 over in the afternoon with K Wok. K Wok
5 was his compliance person at his business.
6 So then Alan left, took the flight out,
7 and then they stopped by for the
8 reception. So he and K Wok came over to
9 our reception.

10 Q. Got you. Okay.

11 And so you did see Mr. Martino
12 that night at the reception?

13 A. At the reception, yes.

14 Q. Okay. And at that point in time
15 you were aware that Mr. Martino had
16 invested some money with Mr. Hanke,
17 correct?

18 A. Yes, in a very previous
19 conversation about it. I had not
20 realized it then, and I think that was
21 right after I had been at his office.
22 That is what I am trying to figure out if
23 it was then or if it was previously. I
24 don't remember. But, yes, we just spoke
25 basically about the industry in general.

1 ROY-HAEGER

2 i n New York?

3 A. I don't remember.

4 Q. You don't remember exactly what
5 you discussed in the meeting in May?

6 A. No.

7 Q. Okay. I am going to go to page
8 15. So this is from August 7, 2019, in
9 or around that date. It looks like Mr.
10 Martino is asking for an address. You
11 tell him you are at the Marriott in New
12 York, and you say "Lance wants to meet
13 also." And you ask "Do you want to meet
14 together or separate."

15 Do you see that?

16 A. I do.

17 Q. So this was you speaking with
18 Mr. Martino trying to coordinate a meeting
19 while you were in New York, correct?

20 A. Correct. We had had a special
21 women's conference, so I was there for a
22 day.

23 Q. And you suggest or open the
24 possibility of having a meeting with
25 Lance.

1 ROY-HAEGER

2 Why did it make sense to
3 potentially have the meeting with Mr.
4 Martino together with the meeting with
5 Lance?

6 A. Because they were friends, and
7 they would always call together to try to
8 get updates in the beginning a couple of
9 times, and so rather than when -- I had
10 very little time because I was only there
11 a day. Rather than say the same thing and
12 give him updates separately, they were
13 friends. I figured it would be easier if
14 we did it one time because I had very
15 limited time.

16 Q. Understood. And this was
17 providing -- so the intent of this meeting
18 was to provide both Lance and Mr. Martino
19 updates as to the transaction, the one Mr.
20 Al Thani invested \$1 million into,
21 correct?

22 A. Yes, correct.

23 Q. And you did in fact meet with
24 Lance in New York around this time and
25 provided him an update in New York,

1 ROY-HAEGER

2 correct?

3 A. Correct.

4 Q. Did you also meet with Mr.
5 Martino at this time?

6 A. I don't think so. I am trying
7 to remember because there had been talk
8 about him swinging by for five minutes at
9 the hotel, but I think I recall that he
10 said he got busy, and he was going to go
11 out with family, and he didn't have time,
12 but I really don't remember if it was --
13 it was for about a two-minute meeting as
14 he was walking passed, but I don't think
15 he ever came, and I can't remember.

16 Q. But you still updated both Mr.
17 Martino and Lance periodically whether it
18 be an in-person meeting such as this one
19 in August or via Whatsapp, text e-mail,
20 directed toward them, correct?

21 A. Correct, because they kept
22 calling. So I didn't really have a
23 choice.

24 Q. Okay. On this page 12 you say
25 "I am still backed up at the office on

1 ROY-HAEGER

2 THE WITNESS: Thank you. Did
3 you make a list? I think I have a partial
4 list, but are you going to send me a list
5 of the items you wanted me to provide
6 here?

7 MR. Ducharme: We can go off
8 the record.

9 (Time noted: 2:25 p.m.)

10

11

12

13

14

15

16

AMY ROY-HAEGER

17

18 Subscribed and sworn to before me
19 this day of , 2021

20

21

22

23

24

25

1

2 C E R T I F I C A T I O N

3

4

5

6 I, DEBBIE ZAROMATIDIS, a Shorthand
7 Reporter and a Notary Public, do hereby
8 certify that the foregoing witness, AMY
9 ROY-HAEGER, was duly sworn on the date
10 indicated, and that the foregoing is a
11 true and accurate transcription of my
12 stenographic notes.

13 I further certify that I am not
14 employed by nor related to any party to
15 this action.

16

17

18

19

20

21

22

23

24

25

Debbie Zaromatidis

DEBBIE ZAROMATIDIS

E X H I B I T S

	EXHIBIT	DESCRIPTION	PAGE
1	1	E-mail	33
2	2	E-mail	38
3	3	E-mail	56
4	4	Loan agreement	69
5	5	E-mail	93
6	6	E-mail	96
7	7	E-mail	100
8	8	E-mail	103
9	9	E-mail	106
10	10	E-mail	110
11	11	E-mail	114
12	12	E-mail	114
13	13	Whatsapp messages	130
14	14	Text messages screen shot	146
15	15	E-mail	158
16	16	Text mesaages screen shot	164